

negotiating the scope of document production and depositions but need additional time to complete this phase of discovery.

LUPE Plaintiffs and Defendant Intervenors therefore respectfully request that the deadline to conclude discovery by or upon Defendant Intervenors with respect to the 2022 Primary Election be extended to March 3, 2023. LUPE Plaintiffs and Defendant Intervenors make this request jointly and not for the purposes of delay. No other party opposes this motion.

January 26, 2023

Respectfully submitted,

/s/ Nina Perales

Nina Perales
Julia R. Longoria
*MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND*
110 Broadway, Suite 300
San Antonio, TX 78205
Telephone: (210) 224-5476
Facsimile: (210) 224-5382
nperales@maldef.org
jlongoria@maldef.org

Michael C. Keats*
Rebecca L. Martin*
Jason S. Kanterman*
Kevin Zhen*
*FRIED, FRANK, HARRIS, SHRIVER &
JACOBSON LLP*
One New York Plaza
New York, New York 10004
Telephone: (212) 859-8000
Facsimile: (212) 859-4000
michael.keats@friedfrank.com
rebecca.martin@friedfrank.com
jason.kanterman@friedfrank.com
kevin.zhen@friedfrank.com
* Admitted pro hac vice

s/ John M. Gore

John M. Gore
E. Stewart Crosland*
Stephen J. Kenny*
Charles E.T. Roberts
JONES DAY
51 Louisiana Avenue, N.W.
Washington, D.C. 20001
Phone: (202) 879-3939
Fax: (202) 626-1700
jmgore@jonesday.com
scrosland@jonesday.com
skenny@jonesday.com
cetoberts@jonesday.com

Counsel for Proposed Intervenor-Defendants
*Pro hac vice

Attorneys for Plaintiffs:
LA UNIÓN DEL PUEBLO ENTERO
SOUTHWEST VOTER REGISTRATION

**EDUCATION PROJECT
MEXICAN AMERICAN BAR
ASSOCIATION OF TEXAS
TEXAS HISPANICS ORGANIZED FOR
POLITICAL EDUCATION
JOLT ACTION
WILLIAM C. VELASQUEZ INSTITUTE
FIEL HOUSTON INC.**

/s/ Sean Morales-Doyle

Sean Morales-Doyle

Eliza Sweren-Becker*

Jasleen K. Singh*

**BRENNAN CENTER FOR JUSTICE AT
NYU SCHOOL OF LAW**

120 Broadway, Suite 1750

New York, NY 10271

Telephone: (646) 292-8310

Facsimile: (212) 463-7308

sean.morales-doyle@nyu.edu

eliza.sweren-becker@nyu.edu

patrick.berry@nyu.edu

andrew.garber@nyu.edu

* Admitted pro hac vice

Paul R. Genender
Texas State Bar No. 00790758
Elizabeth Y. Ryan
Texas State Bar No. 24067758
Megan Cloud
Texas State Bar No. 24116207
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201
Telephone: (214) 746-8158
Facsimile: (214) 746-7777
Liz.Ryan@weil.com
Paul.Genender@weil.com
Megan.Cloud@weil.com

**Attorneys for Plaintiffs:
FRIENDSHIP-WEST BAPTIST
CHURCH
ANTI-DEFAMATION LEAGUE
AUSTIN, SOUTHWEST, AND
TEXOMA REGIONS
TEXAS IMPACT
JAMES LEWIN**

CERTIFICATE OF CONFERENCE

I certify that I conferred with counsel for the Plaintiffs, Defendants and Intervenor-Defendants regarding this motion on January 25 and 26. Intervenor-Defendants join this motion. Defendants do not oppose this motion. Plaintiff the United States does not oppose this motion. Private Plaintiffs Mi Familia Vota, HAUL, OCA-Greater Houston, *et al.* and LULAC do not oppose this motion.

/s/ Nina Perales

NINA PERALES

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on January 26, 2023, and that all counsel of record were served by CM/ECF.

/s/ Julia R. Longoria
JULIA R. LONGORIA